

Michael R. McDonald Director

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January 12, 2022

VIA ECF

Honorable Jessica S. Allen, U.S.M.J. U.S. District Court for the District of New Jersey Martin Luther King Jr. Building & U.S. Courthouse 50 Walnut Street Newark, New Jersey 07102

Re: White, et al. v. Samsung Electronics America, Inc., et al.

Case No. 17-1775 (MCA)(JSA)

Dear Magistrate Judge Allen:

Gibbons P.C., along with Covington & Burling LLP, represent Defendant Samsung Electronics America, Inc. ("Samsung") in the above-referenced matter. On behalf of all parties in this matter, we submit for Your Honor's consideration, the enclosed proposed Consent Order Extending Time for Defendant to Respond to Plaintiffs' Second Amended Complaint Pursuant to Local Civil Rule 6.1(a).

If the form of the Proposed Stipulation and Consent Order meets with Your Honor's approval, we ask that it be So Ordered and entered on the docket in this matter.

Thank you for your kind consideration and please do not hesitate to contact me should there be any questions.

Respectfully submitted,

s/ Michael R. McDonald Michael R. McDonald

Enclosure

cc: All Counsel of Record (via ECF)